

WA3019
1/1/2015
IB

DRIP PAD MANAGEMENT PLAN

FILE COPY

McFarland Cascade Holdings Inc
6520 – 188TH Street NE
Arlington, WA 98223

January 2015



**DRIP PAD MANAGEMENT PLAN
CERTIFICATION**

I certify that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete.



Edward Smith
Sr. Environmental Manager
McFarland Cascade Pole & Lumber Company

1/9/15
Date

**DRIP PAD MANAGEMENT PLAN
RECORD OF REVIEW AND AMENDMENTS**

Reviews and amendments to the *Drip Pad Management Plan* for the Selkirk Forest Products Company in Galloway, British Columbia are summarized below, in accordance with Section 3.0 of the plan. The Environmental Manager is responsible for maintaining the operational copy of this plan.

RECORD OF REVIEW

Date	Reviewed By	Comments
01/09/2015	Edward Smith	Plan revised for sealed surface

RECORD OF AMENDMENTS

Date	Change Number	Summary of Amendments	Environmental Specialist Initials
01/09/2015	1	Plans to address sealed surface	ECS

TABLE OF CONTENTS

Section	Page
CERTIFICATION	i
RECORD OF REVIEW AND AMENDMENTS	ii
1.0 INTRODUCTION	1
1.1 DRIP PAD SYSTEM DESCRIPTION	3
1.2 DRIP PAD MANAGEMENT REQUIREMENTS	3
2.0 GENERAL DRIP PAD SYSTEM MANAGEMENT PRACTICES	5
2.1 ROLES AND RESPONSIBILITIES	5
2.1.1 Director of Environmental Health and Safety	5
2.1.2 Environmental Manager and EHS Supervisor	5
2.1.3 Plant Manager	6
2.1.4 Drip Pad Inspection Technician	6
2.1.5 Treating Engineer	6
2.2 DRIP PAD SYSTEM INSPECTION PROCEDURES	6
2.2.1 Drip Pad Inspection	7
2.3 DRIP PAD LOGGING PROCEDURES	7
2.4 DRIP PAD CLEANING PROCEDURES	8
3.0 PLAN REVIEW AND AMENDMENTS	9

LIST OF FIGURES

Figure 1 Site Location Map

LIST OF APPENDICES

Appendix A Drip Pad System Certifications

Appendix B Inspection Logs

1.0 INTRODUCTION

McFarland Cascade Holdings Inc, a Stella-Jones Company (MCHI) operates a manufacturing facility in Arlington, Washington that produces preservative-treated poles primarily for the utility industry. Operations at the facility include pole peeling, kiln drying, and both butt treatment and pressure treatment of poles. Existing treating operations make use of pentachlorophenol (PCP) and copper naphthenate (CuNap) to a limited extent.

MCHI is a leader in the production of preservative-treated products for utility and infrastructure use throughout the United States and Canada. The site is located in Arlington, Washington, in Snohomish County approximately 2.5 miles south of downtown Arlington. The facility address is as follows:

McFarland Cascade Holdings, Inc.
6520 188th Street N.E.
Arlington, Washington 98223-8707

This facility produces utility poles treated with PCP and copper naphthenate. Coastal Douglas Fir, Western Red Cedar, and Alaskan Yellow Cedar poles are processed through a rotary peeler to remove the bark. Some of these peeled poles are then dried in a dehumidification kiln while the remaining poles are conditioned inside the treating cylinder as part of the treating process. Bark generated as a result of peeling operations is sold to a nearby facility for use as a fuel in their cogeneration electrical power plant.

After peeling, poles are scaled for class, cut to length, and then transported to the appropriate storage piles in the untreated storage yard sticker stacked on skids above ground for air-drying until needed. Air dried untreated poles are moved from untreated storage area to the framing area, where "Customer-Specific" identification face and butt burn branding and or tagging is completed. Also, ground line and cross arm, hardware hole patterns are installed, as well as any cross arm gains or notches are installed. After framing poles are either loaded on trams for "Kilns" pre drying for preservative pressure treating, or loaded for immersion in "Butt Tank" for treatment of the butt end of the pole only. After treating, poles are allowed to stand on covered drip pads (in accordance with WAC 173-303-675 and Subpart W of 40 CFR Part 265 requirements) to ensure that preservative does not leave the treating area.

After the treatment process is complete, the poles are bored and inspected to verify compliance with specifications and moved to the yard for storage prior to shipment. Treated poles are shipped from the site

by either truck or rail. Drawing GR-002 shows the current layout of the site including details identifying both treated and non-treated storage areas of the site.

1.1 DRIP PAD SYSTEM DESCRIPTION

The plant was built in 1971 with pressure treating starting in the early 1980s as J.H. Baxter & Co. Concrete drip pads were constructed in May 1991. The design was certified in a Woodward-Clyde report by a professional engineer registered in California in March 1991.

Stella-Jones purchased the plant in 2007. In an asset transfer (December 31, 2013) McFarland Cascade Holdings Inc. acquired the plant operations. Note, MCHI is wholly owned by Stella-Jones, Inc. and therefore the management of the facility did not change as a result of this transfer.

In 2014, the drip pads were lined with steel to act as the primary liner meeting the requirements of 40 CFR 265.442(b). Design drawings for steel drip pads were prepared in October 2014. As a result, this drip pad is subject to annual re-certification.

1.2 DRIP PAD MANAGEMENT REQUIREMENTS

The requirements of Subpart W of 40 CFR 264 apply to owners and operators of facilities that use drip pad to convey treated wood drippage, precipitation, and/or surface water runoff to an associated collection system. Under 40 CFR 264, facilities that operate drip pads shall:

1. Maintain and comply with a written contingency plan that describes how the owner or operator will respond to infrequent and incidental drippage in the treated wood product storage yard. At a minimum, the contingency plan must describe how the owner or operator will:
 - Clean up the drippage;
 - Document the cleanup of the drippage;
 - Retain documents regarding cleanup for three years; and
 - Manage the contaminated media in a manner consistent with Federal regulations.
2. Maintain the independent qualified registered professional engineer's written assessment of the drip pad that confirms compliance with all applicable requirements of Subpart W.
3. Annual recertify applicable portion of the drip pad system. Specifically, the independent qualified registered professional engineer must recertify the steel operating surface of the drip pad the was installed in December 2014.

While a drip pad is in operation, it must be inspected weekly and after storms to detect evidence of:

- Deterioration, malfunctions or improper operation of run-on and runoff control systems,
- The presence of leakage in and proper functioning of leak detection system, and
- Deterioration or cracking of the drip pad surface.

In addition, 40 CFR 264.573 also specifies the following inspection and maintenance procedures:

- Drip pads must be maintained such that they remain free of cracks, gaps, corrosion, or other deterioration that could cause hazardous waste to be released from the drip pad.
- Drillage and accumulated precipitation must be removed from the associated collection system as necessary to prevent overflow of the drip pad.
- The drip pad surface must be cleaned to allow weekly inspections of the entire drip pad surface without interference or hindrance from accumulated residues. The operator must document the date and time of each cleaning and the cleaning procedure used in the facility's operating log. The owner or operator must determine if the residues are hazardous as per 40 CFR 262.11.
- Collection and holding units associated with run-on and runoff control systems must be emptied or otherwise managed as soon as possible after storms to maintain design capacity of the system.
- After being removed from the treatment vessel, treated wood from pressure and non-pressure processes must be held on the drip pad until drillage has ceased. The operator must maintain records sufficient to document that all treated wood is held on the pad following treatment in according with this requirement.
- Throughout the active life of the drip pad, if the operator detects a condition that may have caused or has caused a release of hazardous waste, the condition must be repaired within a reasonably prompt period of time following discovery, in accordance with the following procedures:
 - Record the date of discovery in the facility operating log;
 - Immediately remove the affected portion of the drip pad from service;
 - Develop a repair plan and schedule and clean up any leakage from below the drip pad; and
 - Notify the Regional Administrator within 24 hours of discovery, and provide written notice within 10 working days. Written notice must include the repair plan and schedule and the cleanup actions, if required.

2.0 GENERAL DRIP PAD SYSTEM MANAGEMENT PRACTICES

This section describes the drip pad system management practices.

2.1 ROLES AND RESPONSIBILITIES

The roles and responsibilities for the Drip Pad Management Plan implementation are described in the following sections.

2.1.1 Director of Environmental Health and Safety

The Manager of Environmental Health and Safety (EHS) shall:

- Ensure that the Regional Administrator and appropriate regulatory agencies are notified of leakage from below the drip pads and direct any required repair actions.
- Maintain regular contact with the Plant Manager, Environmental Manager and EHS Supervisor concerning inspections, regulatory interpretation and problem resolution.

2.1.2 Environmental Manager and EHS Supervisor

The Environmental Manager and EHS Supervisor shall:

- Ensure compliance with applicable drip pad the management plan and applicable regulations.
- Notify the Regional Administrator of any leakage from below the drip pad and any required repair actions.
- Maintain regular contact with the Director of Technical and Environmental Affairs and the Plant Manager concerning inspections, regulatory interpretation and problem resolution.
- As necessary, ensure that employees and contractor personnel receive Drip Pad Management training.
- Be responsible for annual drip pad system re-certifications.
- Amend the Drip Pad Management Plan as needed and ensure that all amendments are implemented in a timely manner.
- Maintain the operational copy of the Drip Pad Management Plan.
- Keep copies of plan amendments note such amendments on the Amendments and Revisions page at the front of the plan.

- Distribute plan amendments to designated personnel.

2.1.3 Plant Manager

The Plant Manager shall:

- Ensure that inspection forms are properly completed as required.
- Maintain regular contact with the Environmental Manager, Drip Pad Inspection Technician, and the EHS Supervisor concerning inspections, regulatory interpretation and problem resolution.

2.1.4 Drip Pad Inspection Technician

The Drip Pad Inspection Technician shall:

- Be responsible for weekly drip pad inspections.
- Initiate corrective actions of deficiencies found during inspection.
- Notify the Plant Manager of unusual activities that could cause discharges of pollutants.

2.1.5 Treating Engineer

The Treating Engineer(s) shall:

- Inspecting the transfer table, associated piping, auxiliary pans and transfer table pit.
- Initiate actions to correct deficiencies found during inspection.
- Notify the Plant Manager of unusual activities that could cause discharges of pollutants.

2.2 DRIP PAD SYSTEM INSPECTION PROCEDURES

Drip pad inspection procedures are in compliance with 40 CFR 264.573. Applicable components of the drip pad system are inspected and re-certified annually by independent registered professional engineer. The drip pad certifications are attached in Appendix A.

2.2.1 Drip Pad Inspection

MCHI's personnel perform weekly drip pad inspections. The inspection forms are attached in Appendix B. The Drip Pad Manager is responsible for conducting the inspection. The completed inspection forms are maintained in the Environmental Specialist's office and are available upon request. Inspection procedures are outlined below.

Berms – Visually inspect for damage that would allow run-on and run-off. Record the results in comments section.

Surface, Tracks – Visually inspect the surface noting signs of deterioration in the comments section.

Roof – Visually inspect the roof for evidence of leakage and record the results in the comments section.

Cleaning – Visually inspect the drip pad for debris and record findings on the *Inspection and Cleaning Log*. Note that cleaning of the pad should precede the inspection.

Hazardous Waste Accumulation – Visually inspect and document the amount of waste generated from each drip pad on the drip pad inspection and cleaning forms. Note, the waste for the PCP drip pad is a listed F032 waste.

Maintenance – Action items noted during the weekly inspection must be completed promptly.

2.3 DRIP PAD LOGGING PROCEDURES

MCHI's drip pad logging procedures are in compliance with 40 CFR 264.573. The *Drip Pad Log* forms are in Appendix B. The Drip Pad Manager, or associate mobile equipment operator is responsible for completing the *Drillage Ceased Log* when the drillage has ceased. The completed inspection forms are maintained in the main office.

2.4 DRIP PAD CLEANING PROCEDURES

Drip pad cleaning procedures are designed to prevent deterioration of the drip pad and allow for thorough inspection of the drip pad surface. The *Drip Pad Cleaning & Inspection Log* form is attached in Appendix B. Drillage, dirt, and debris are removed on an as need basis. During the weekly inspection, the drip pads must be clean enough for a thorough visual inspection. The Drip Pad Manager is responsible for determining if cleaning is required.

Cleaning of the drip pads can be accomplished using any of the following methods, or a combination of one or more:

- Manual sweeping
- Machine sweeping
- Vacuuming
- Water washing without detergent
- Steam cleaning without detergent

Any residual from the PCP drip pad is designed as a listed (F032) hazardous waste. The residual hazardous waste and must be handled in accordance with State and Federal regulations. The start date to be entered on any hazardous waste container utilized for these materials is the date the container is completely filled. The amount of material removed from the drip pad during cleaning is recorded on the *Drip Pad Cleaning & Inspection Logs*. The logs are attached in Appendix B.

3.0 PLAN REVIEW AND AMENDMENTS

The Drip Pad Management Plan for MCHI is maintained by the Environmental Manager and EHS Supervisor in a EHS Department office area. A copy of the plan must be made available if requested by applicable regulatory agency.

MCHI will modify the Drip Pad Management Plan whenever there is a change in design, construction, operation, or maintenance that causes the plan to be less or more effective in controlling pollutants. The plan will also be modified whenever a self-inspection reveals that the description of potential pollutant sources or established pollution prevention measures and controls are inadequate.

The Environmental Manager and EHS Supervisor are responsible for the preparation and implementation of amendments to this plan. The Environmental Manager and EHS Supervisor keep a copy of any amendments to this plan, and notes such amendments on the Amendments and Revisions page at the front of the plan. Copies of each amendment are also distributed to designated facility personnel.

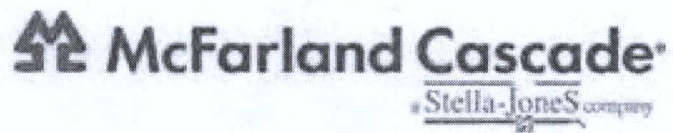
APPENDIX A
DRIP PAD SYSTEM CERTIFICATIONS

**CERTIFICATION
REPORT**

PHOENIX ENVIRONMENTAL ENGINEERS, INC.

*Drip Pad Certification
Cylinder No. 2*

For



Arlington, Washington

Prepared by:



December 2014

Rev. 1

P.O. Box 121555, Nashville, TN 37212
615.292.0401 - fax 615.292.1080

INTRODUCTION

This Certification covers the drip pad in front of Treatment Cylinder No. 2 at the above-referenced facility. The facility consists of two, 8 foot diameter by 144 foot long pentachlorophenol treating cylinders. The treating cylinders are known as No. 2 and No. 3. This report covers No. 2 Cylinder drip pad. The drip pads are 12 ft wide x 165 ft long. Both drip pad systems are independent of one another and have no interconnections. The door pits are concrete with steel pans to isolate drippage and keep out drainage from around the cylinders. All of the drip pad system is outdoors but protected from precipitation by a shed roof.

The plant was built in 1971 with pressure treating starting in the early 1980s as J.H. Baxter & Co. Concrete drip pads were constructed in May 1991. The design was certified in a Woodward-Clyde report by a professional engineer registered in California in March 1991. Stella-Jones purchased the plant in 2007. In 2014, the drip pads were lined with steel to act as the primary liner meeting the requirements of 40 CFR 265.442(b). Design drawings for steel drip pads were prepared in October 2014. Data provided by Stella-Jones Corporation for use in this assessment included the drip pad design drawings and certification dated March 1991, an as-built survey prepared in August 2012, and photographs of the drip pad during construction and as-built.

On-site observation of the steel drip pad installation was performed on December 17 through 20, 2014. The photographs taken during installation are included in Attachment 1. Compliance with each regulatory design requirement under 40 CFR 265.443 is evaluated below. Record drawings for the steel drip pad are included in Attachment 2. The design of the concrete drip pads is included in Attachment 3.

DESIGN REQUIREMENTS COMPLIANCE

1. 40 CFR 265.443(a)(1) Constructed of Non-Earthen Materials

The drip pad is constructed of 1/2" steel plate. Further aspects of the drip pad construction are described below as they relate to the design requirements. Steel construction satisfies this requirement.

2. 40 CFR 265.443(a)(2) Sloped to Free Drain to Collection System

The drip pad slopes toward the door pit at an average slope of 0.5 percent and drain freely down the tracks to the door pit. This measured slope satisfies this requirement.

3. 40 CFR 265.443(a)(3) Curbed or Bermed Around Perimeter

The edges of the steel pad are raised around the perimeter to form a 4" high curb that contains any drippage within the pad. This metal curb satisfies this requirement.

4. 40 CFR 265.443(a)(4)(i) Hydraulic Conductivity Less Than or Equal to 1×10^{-7} cm/sec and Chemically Compatible with Preservatives

The 1/2" steel plate is virtually impervious to penetration by liquids. Therefore, this requirement is satisfied.

5. 40 CFR 265.443(a)(5) Sufficient Structural Strength and Thickness

The drip pads are constructed of 1/2" thick steel plate founded on reinforced concrete. The drip pads are structurally sound and adequate for the loads applied. This requirement is satisfied.

6. 40 CFR 265.443(c) Free of Cracks, Gaps, Corrosion or Other Deterioration That Could Cause Releases

The drip pads are made of welded steel plate. Upon inspection, no cracks, gaps, corrosion or other deterioration that could cause a release was observed. This requirement is satisfied.

7. 40 CFR 265.443(d) Convey, Drain and Collect Liquid to Prevent Run-Off

The drip pads are sloped at 0.5 percent to the door pit which allows them to convey, drain, and collect liquids without running off the drip pad. This requirement is satisfied.

8. 40 CFR 265.443(e) Run-On Control System for 25-yr, 24-hr Storm

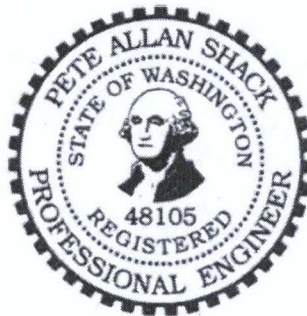
The drip pans are protected from precipitation by a guttered roof so that neither run-off nor run-on is generated. In addition, there is capacity to remove 20 gpm of liquid in the event of unforeseen circumstances, such as destruction of the roof by storm. This requirement is satisfied.

9. 40 CFR 265.443(f) Run-Off Management System for 25-yr, 24-hr Storm

The drip pads are covered by a roof. This requirement is satisfied.

10. 40 CFR 265.443(g) Drip Pad Assessment Certified By Professional Engineer

New drip pads are to be assessed and certified upon construction by a Professional Engineer. This Engineer's Assessment of the extent to which the referenced drip pad meet the design requirements of 40 CFR 265.443(a) through (f) shows the drip pad satisfies all of those design requirements.



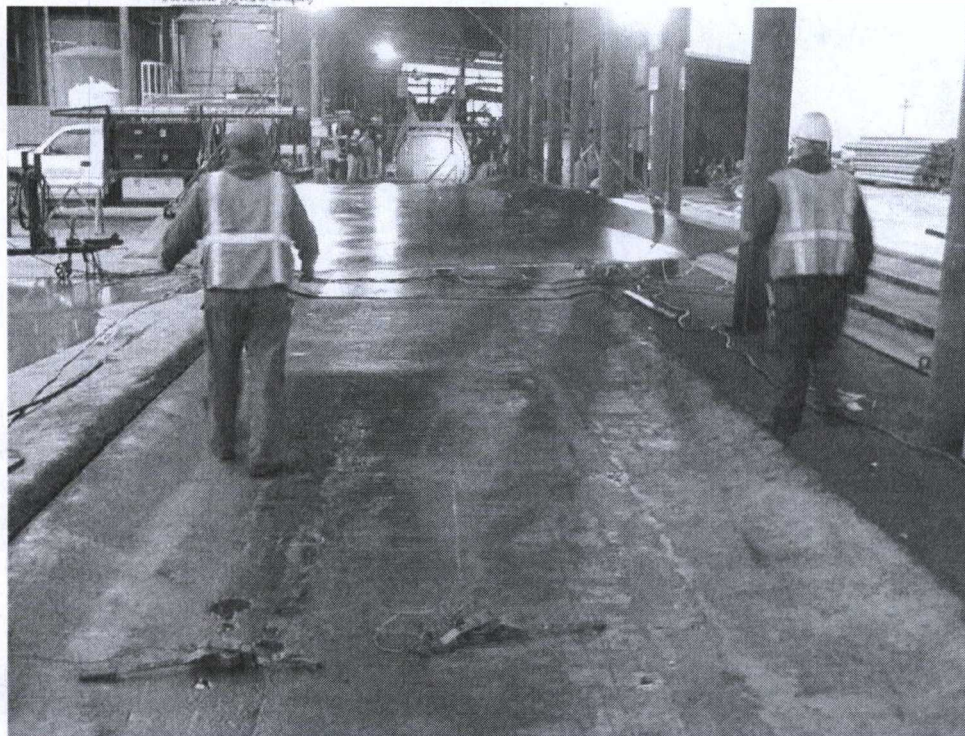
A handwritten signature in black ink, appearing to read "Pete A. Shack", written over a horizontal line.

Pete A. Shack, P.E.
Washington P.E. No. 48105

12/20/14

Date

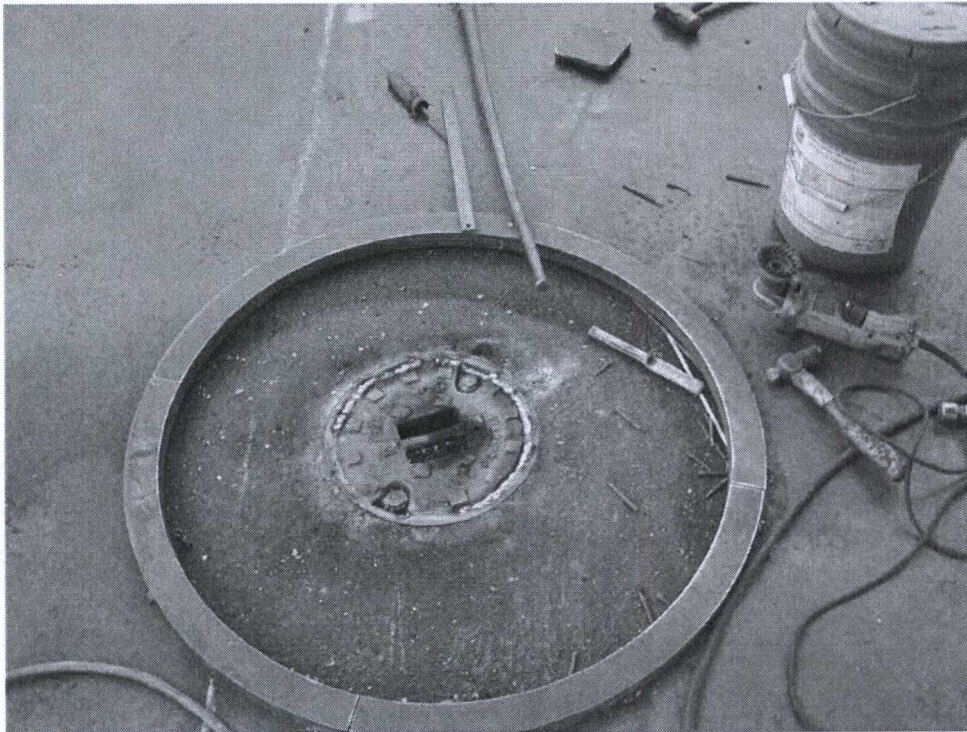
ATTACHMENT 1
SITE PHOTOGRAPHS



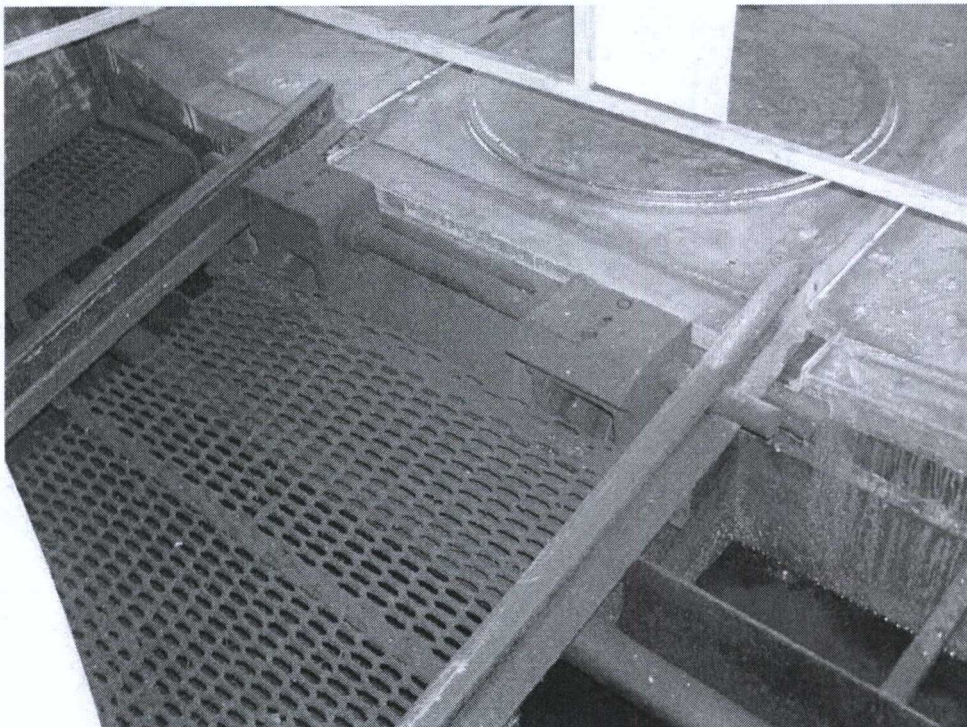
Placing Steel Panels



Welded Steel Panels



Welding Inspection Port Closed



Details at Door Pit



Details at Back End



Pin



Pin Epoxied and Welded in Place



Cylinder No. 2 Drip Pad Looking South



Cylinder No. 2 Drip Pad Looking North

ATTACHMENT 2

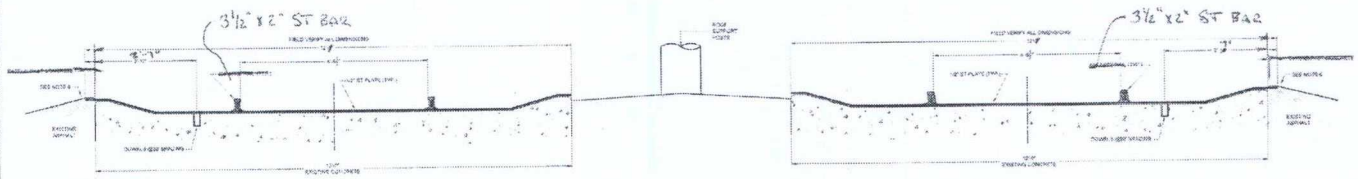
RECORD DRAWINGS

CYL #3

CYL #2



PLAN - STEEL DRIP PAN



TYPICAL SECTION @ PAN

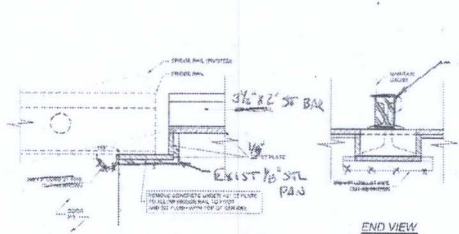
RECORD DRAWING

12/24/14

NO.	DESCRIPTION	DATE
1	DESIGN	12/24/14
2	REVISION	12/24/14

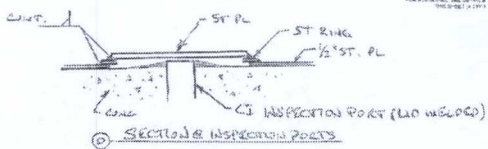


STELLA-JONES WOOD PRESERVING ARLINGTON, VA, PLANT	DATE: 12/24/14 DRAWN BY: JG CHECKED BY: JG APPROVED BY: JG SCALE: AS SHOWN	STEEL DRIP PAN DESIGN PLAN & TYPICAL SECTION 12/24/14 14-0221
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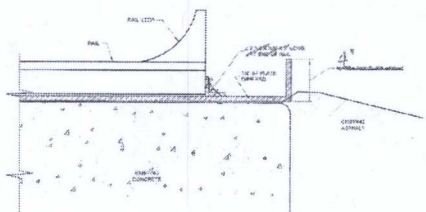


SECTION @ BRIDGE RAIL LANDING

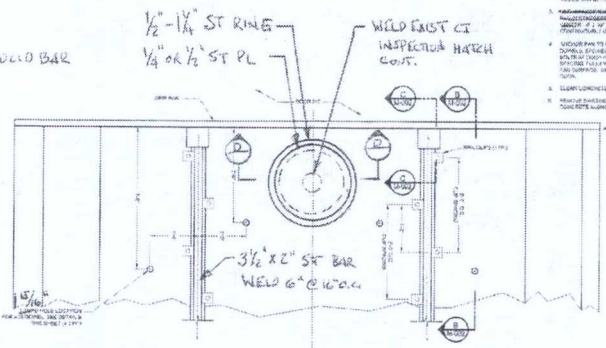
END VIEW



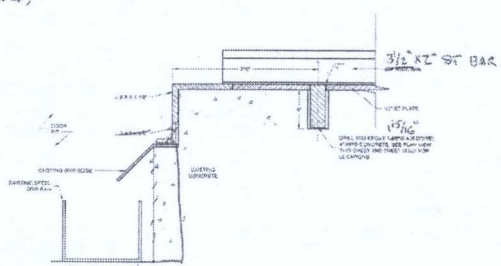
SECTION @ INSPECTION PORTS



SECTION @ END OF TRACKS



PLAN VIEW - DRIP PAD @ DOOR PIT



SECTION @ DOOR PIT

1. ALL STEEL SHALL BE A36 UNLESS OTHERWISE SPECIFIED. WELDS SHALL BE E70XX.
2. USE FULL PENETRATION BUTT WELDS FOR ALL JOINTS. ALL JOINTS SHALL BE WELDED TO THE INSIDE OF THE STRUCTURE AND SHOWN ON THE EXTERIOR.
3. ALL WELDS SHALL BE WELDED TO THE INSIDE OF THE STRUCTURE AND SHOWN ON THE EXTERIOR.
4. WELDS SHALL BE WELDED TO THE INSIDE OF THE STRUCTURE AND SHOWN ON THE EXTERIOR.
5. WELDS SHALL BE WELDED TO THE INSIDE OF THE STRUCTURE AND SHOWN ON THE EXTERIOR.
6. WELDS SHALL BE WELDED TO THE INSIDE OF THE STRUCTURE AND SHOWN ON THE EXTERIOR.
7. WELDS SHALL BE WELDED TO THE INSIDE OF THE STRUCTURE AND SHOWN ON THE EXTERIOR.

RECORD DRAWING
12/24/14

1	DATE OF CONSTRUCTION	DATE OF REVIEW
2	DATE OF CONSTRUCTION	DATE OF REVIEW
3	DATE OF CONSTRUCTION	DATE OF REVIEW

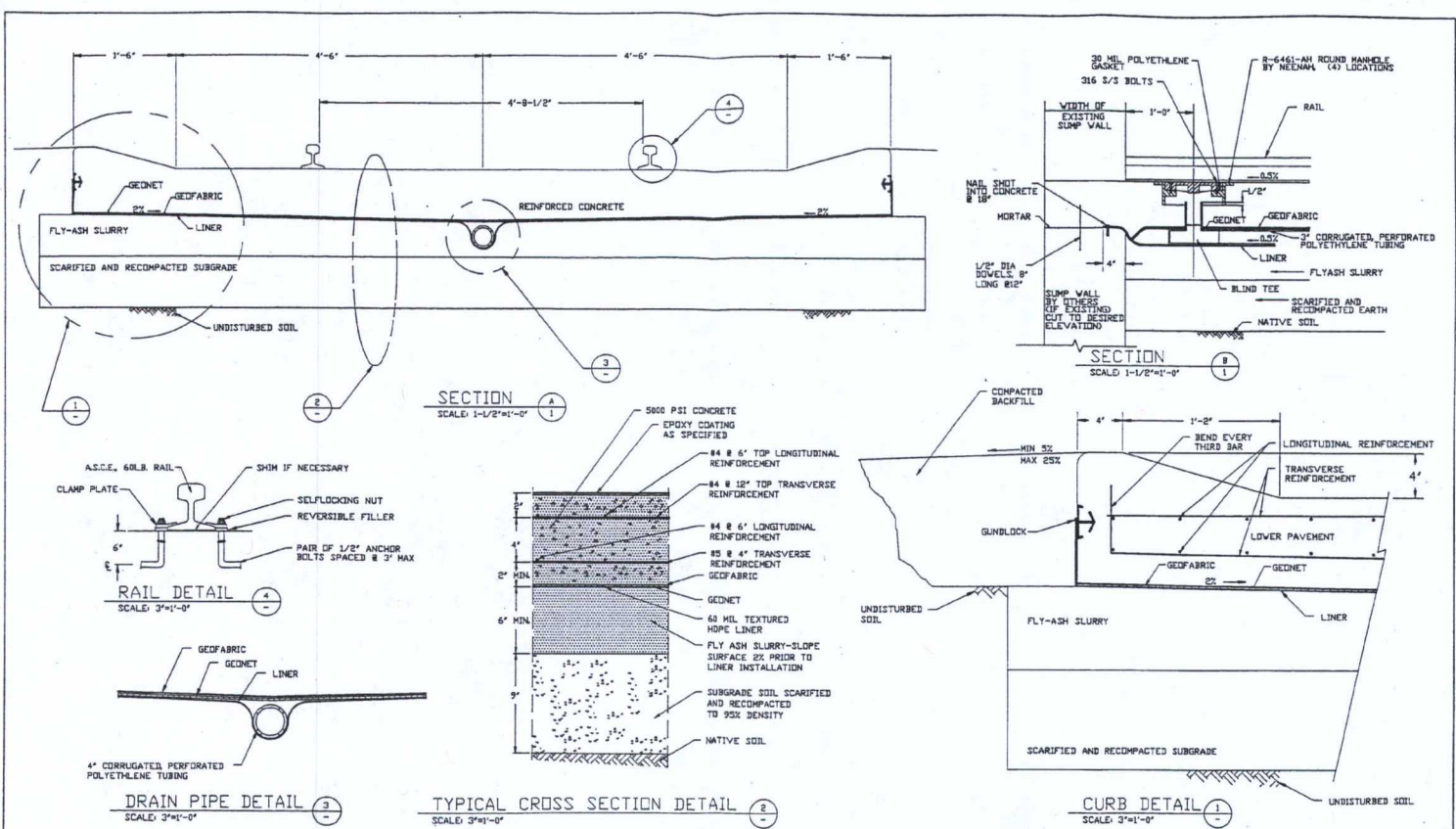


ENVIRONMENTAL ENGINEERS, INC.

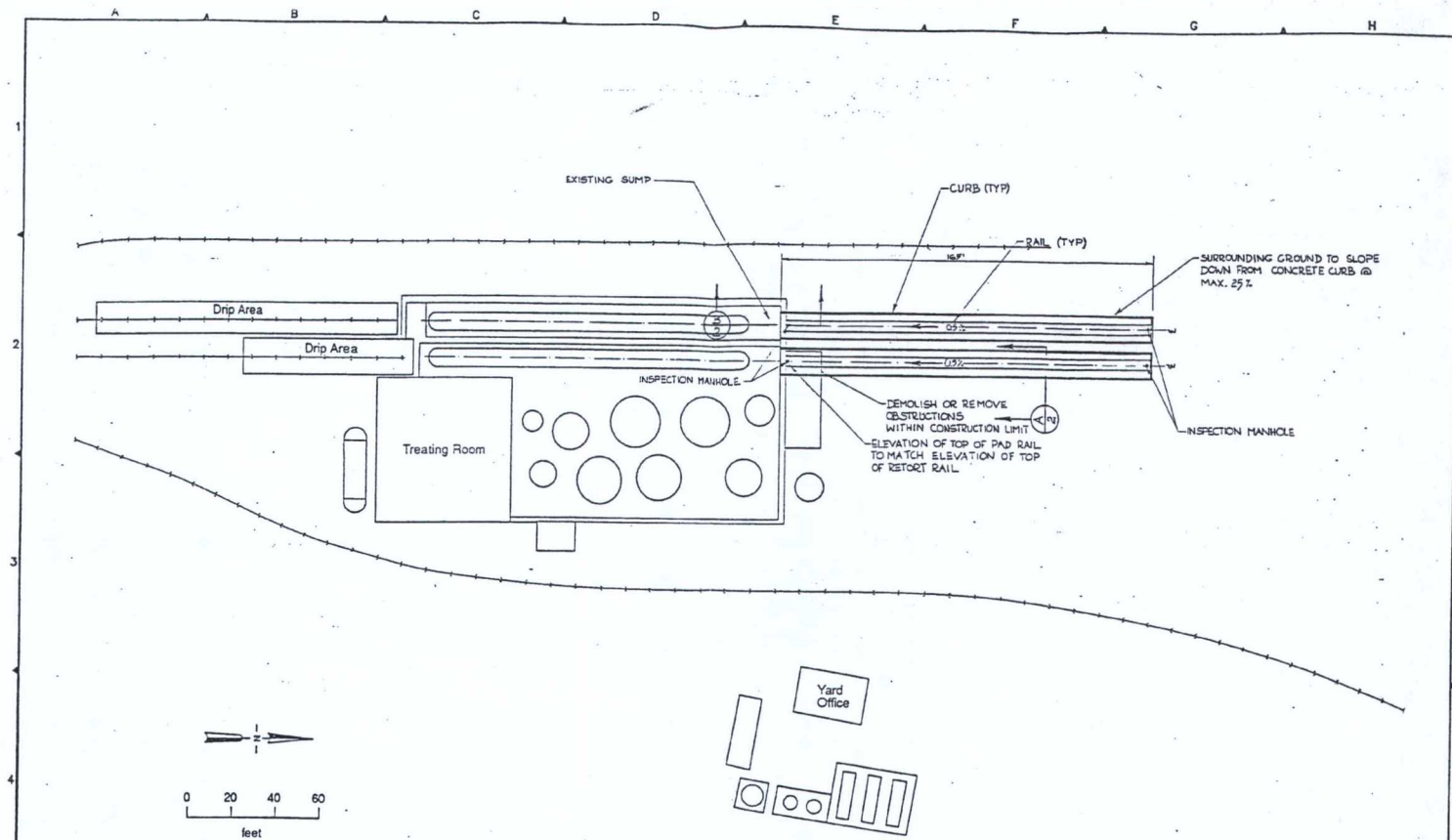
STELLA-ONLINE WOOD PRESERVING
ADULTON WA PLANT

NO.	DATE	DESCRIPTION
1	12/24/14	STEEL DRIP PAD DESIGN DETAILS
2		
3		

ATTACHMENT 3
CONCRETE FOUNDATION DESIGN DRAWINGS



				 Woodward-Clyde Consultants	DESIGNED	LAG	SUBMITTED	DATE	J.H. BAXTER DRIP PAD ARLINGTON PLANT	SECTIONS AND DETAILS	HALF SIZE		DRAWING NO. 2			
					DRAWN	TJS	APPROVED	DATE			DATE	DATE		DATE	DATE	DATE
					CHECKED	SLG	APPROVED	DATE			DATE	DATE		DATE	DATE	DATE
REV.	DATE	BY	APPROV.	REVISION DESCRIPTION									PROJECT NO. 91C0005A	SHEET NO. 2 OF 2		



Woodward-Clyde Consultants				J.H. BAXTER DRIP PAD ARLINGTON PLANT		PLAN		Half Size	
DESIGNED	L.A.G.	DRAWN	L.A.G.	CHECKED	S.L.C.	APPROVED	DATE	PROJECT NO.	SHEET NO.
								3.4.1991 RECORD - (RE)	1 of 2

**CERTIFICATION
REPORT**

PHOENIX ENVIRONMENTAL ENGINEERS, INC.

*Drip Pad Certification
Cylinder No. 3*

For



Arlington, Washington

Prepared by:



P.O. Box 121555, Nashville, TN 37212
615.292.0401 - fax 615.292.1080

December 2014

Rev. 1

INTRODUCTION

This Certification covers the drip pad in front of Treatment Cylinder No. 3 at the above-referenced facility. The facility consists of two, 8 foot diameter by 144 foot long pentachlorophenol treating cylinders. The treating cylinders are known as No. 2 and No. 3. This report covers No. 3 Cylinder drip pad. The drip pads are 12 ft wide x 165 ft long. Both drip pad systems are independent of one another and have no interconnections. The door pits are concrete with steel pans to isolate drippage and keep out drainage from around the cylinders. All of the drip pad system is outdoors but protected from precipitation by a shed roof.

The plant was built in 1971 with pressure treating starting in the early 1980s as J.H. Baxter & Co. Concrete drip pads with leak detection were constructed in May 1991. The design was certified in a Woodward-Clyde report by a professional engineer registered in California in March 1991. Stella-Jones purchased the plant in 2007. In 2014, the drip pads were lined with steel to act as the primary liner meeting the requirements of 40 CFR 265.442(b). Design drawings for steel drip pads were prepared in October 2014. Data provided by Stella-Jones Corporation for use in this assessment included the drip pad design drawings and certification dated March 1991, an as-built survey prepared in August 2012, and photographs of the original drip pad during construction and as-built.

On-site observation of the steel drip pad installation was performed on December 15 through 17, 2014. The photographs taken during installation are included in Attachment 1. Record drawings for the steel drip pad are included in Attachment 2. The design of the concrete drip pads is included in Attachment 3. Compliance with each regulatory design requirement under 40 CFR 265.443 is evaluated below.

DESIGN REQUIREMENTS COMPLIANCE

1. 40 CFR 265.443(a)(1) Constructed of Non-Earthen Materials

The drip pads are constructed of 1/2" steel plate. Further aspects of the drip pad construction are described below as they relate to the design requirements. Steel construction satisfies this requirement.

2. 40 CFR 265.443(a)(2) Sloped to Free Drain to Collection System

The drip pads slope toward the door pit at an average slope of 0.5 percent and drain freely down the tracks to the door pit. This measured slope satisfies this requirement.

3. 40 CFR 265.443(a)(3) Curbed or Bermed Around Perimeter

The edges of the steel pad are raised around the perimeter to form a 4" high curb that contains any drippage within the pads. This metal curb satisfies this requirement.

4. 40 CFR 265.443(a)(4)(i) Hydraulic Conductivity Less Than or Equal to 1×10^{-7} cm/sec and Chemically Compatible with Preservatives

The 1/2" steel plate is virtually impervious to penetration by liquids. Therefore, this requirement is satisfied.

5. 40 CFR 265.443(a)(5) Sufficient Structural Strength and Thickness

The drip pads are constructed of 1/2" thick steel plate founded on reinforced concrete. The drip pads are structurally sound and adequate for the loads applied. This requirement is satisfied.

6. 40 CFR 265.443(c) Free of Cracks, Gaps, Corrosion or Other Deterioration That Could Cause Releases

The drip pads are made of welded steel plate. Upon inspection, no cracks, gaps, corrosion or other deterioration that could cause a release was observed. This requirement is satisfied.

7. 40 CFR 265.443(d) Convey, Drain and Collect Liquid to Prevent Run-Off

The drip pads are sloped at 0.5 percent to the door pit which allows them to convey, drain, and collect liquids without running off the drip pad. This requirement is satisfied.

8. 40 CFR 265.443(e) Run-On Control System for 25-yr, 24-hr Storm

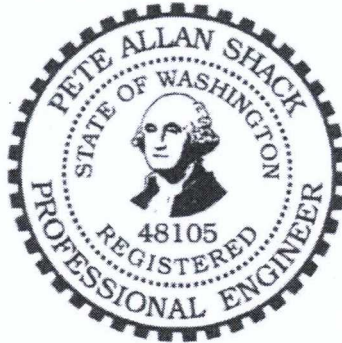
The drip pans are protected by a roof that protects it from precipitation so that neither run-off nor run-on is generated. In addition, there is capacity to remove 20 gpm of liquid in the event of unforeseen circumstances, such as destruction of the roof by storm. This requirement is satisfied.

9. 40 CFR 265.443(f) Run-Off Management System for 25-yr, 24-hr Storm

The drip pads are covered by a roof. This requirement is satisfied.

10. 40 CFR 265.443(g) Drip Pad Assessment Certified By Professional Engineer

New drip pads are to be assessed and certified upon construction by a Professional Engineer. This Engineer's Assessment of the extent to which the referenced drip pad meet the design requirements of 40 CFR 265.443(a) through (f) shows the drip pad satisfies all of those design requirements.



A handwritten signature in dark ink, appearing to read "Pete A. Shack", written over a horizontal line.

Pete A. Shack, P.E.
Washington P.E. No. 48105

12/19/2014
Date

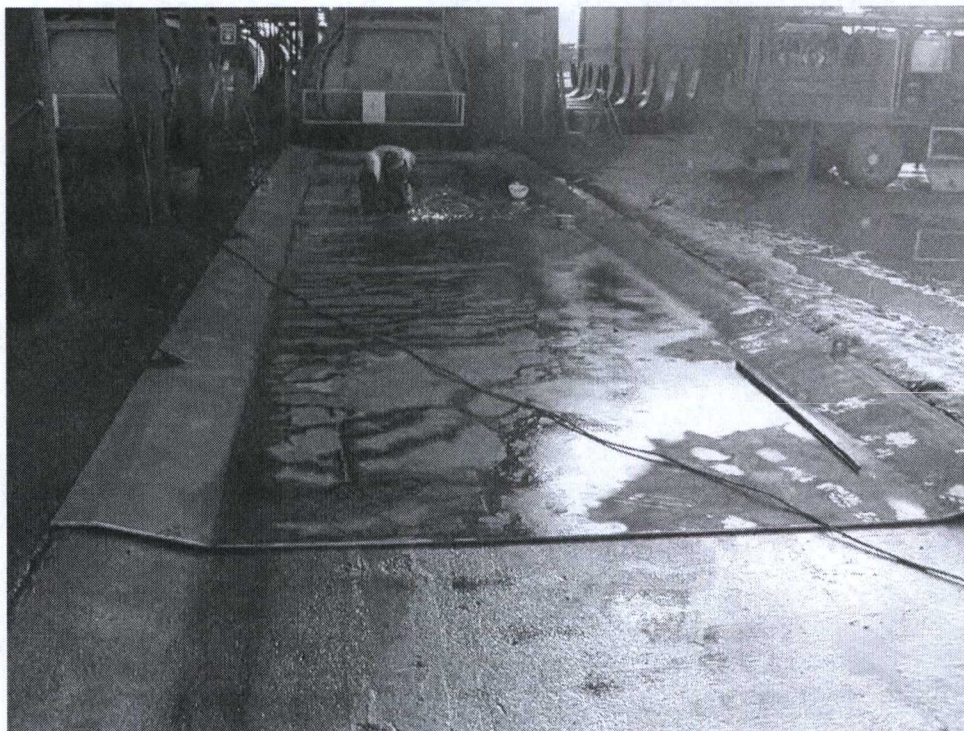
ATTACHMENT 1
SITE PHOTOGRAPHS



Cylinder No. 3 Drip Pad Foundation



Placing Steel Panels



Welding Steel Panels



Welding Inspection Port Closed



Details at Door Pit



Details at Back End



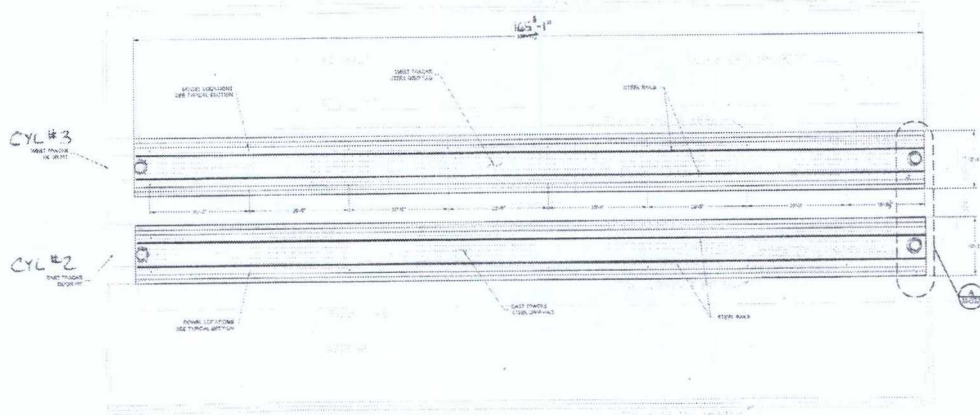
Cylinder No. 3 Drip Pad Looking South



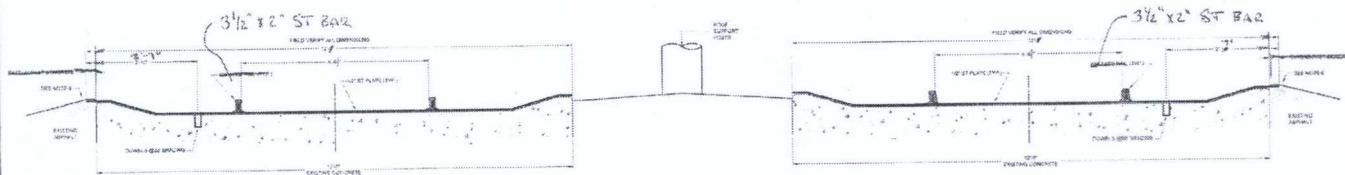
Cylinder No. 3 Drip Pad Looking North

ATTACHMENT 2

RECORD DRAWINGS



PLAN - STEEL DRIP PAN



TYPICAL SECTION @ PAN

RECORD DRAWING
12/24/14

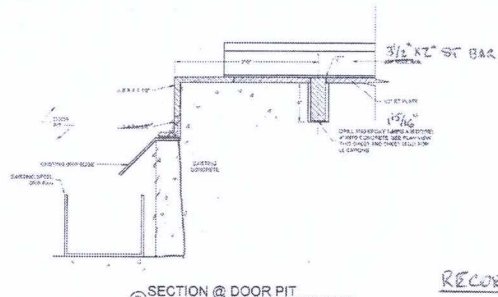
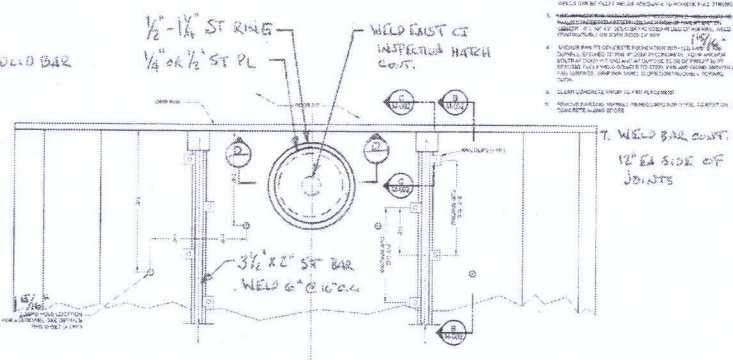
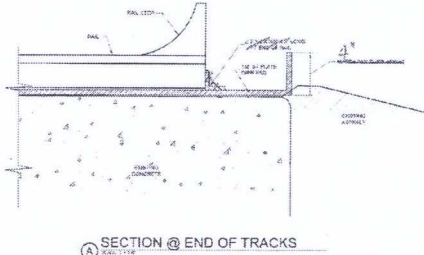
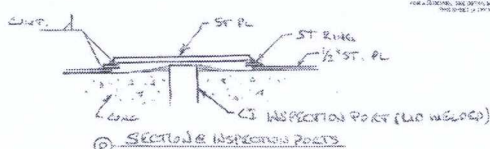
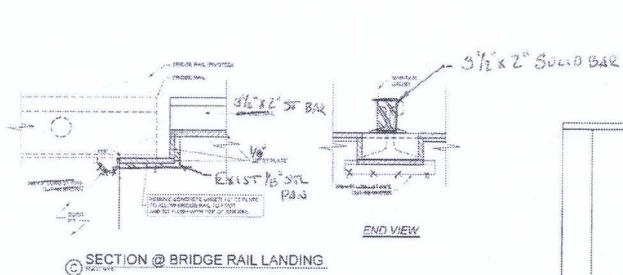
NO.	DATE	DESCRIPTION	BY	CHECKED
1	12/24/14	DESIGN	WJ	WJ
2	12/24/14	REVISION	WJ	WJ



STELLA-JONES WOOD PRESERVING
ATLANTON, WA, PLANT

DESIGNED BY	WJ	CHECKED BY	WJ
DRAWN BY	WJ	DATE	12/24/14
PROJECT NO.	14-0000	SCALE	AS SHOWN
SHEET NO. 1 OF 1			

STEEL DRIP PAD DESIGN
PLAN & TYPICAL SECTION



- NOTES
1. ALL STEEL SHALL BE A36 UNLESS OTHERWISE SPECIFIED.
 2. USE 1/4\"/>
 - 3. WELD ALL JOINTS TO BE FULL PENETRATION BUTT JOINTS.
 - 4. WELD ALL JOINTS TO BE FULL PENETRATION BUTT JOINTS.
 - 5. WELD ALL JOINTS TO BE FULL PENETRATION BUTT JOINTS.
 - 6. WELD ALL JOINTS TO BE FULL PENETRATION BUTT JOINTS.
 - 7. WELD ALL JOINTS TO BE FULL PENETRATION BUTT JOINTS.
 - 8. WELD ALL JOINTS TO BE FULL PENETRATION BUTT JOINTS.
 - 9. WELD ALL JOINTS TO BE FULL PENETRATION BUTT JOINTS.
 - 10. WELD ALL JOINTS TO BE FULL PENETRATION BUTT JOINTS.

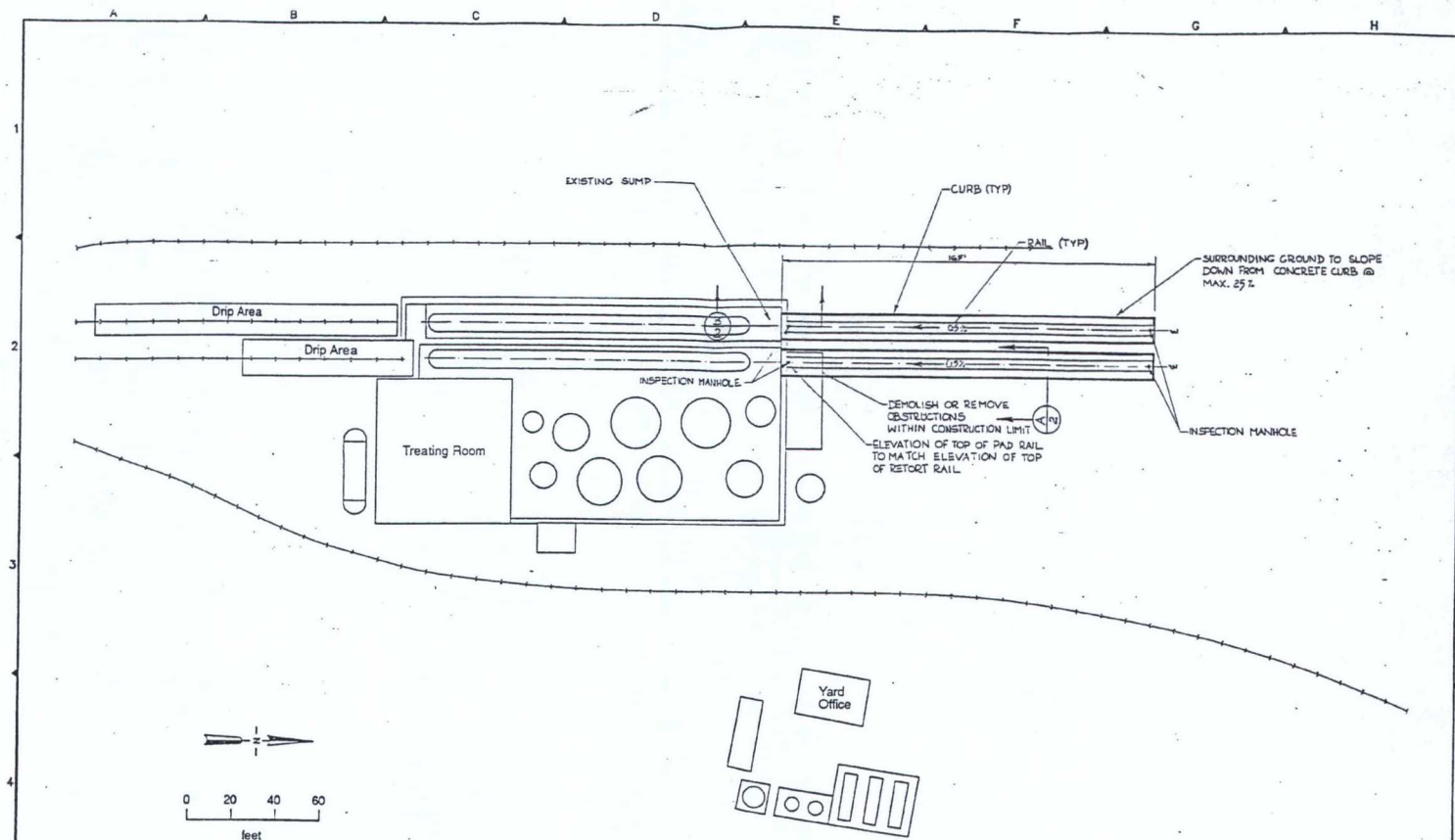
1	DATE	12/24/14
2	BY	MM
3	CHECKED	MM
4	APPROVED	MM



THOMAS
ENGINEERING & DESIGN, INC.

STELLA-CHIEF WOOD PRESERVING KEDRON, WA, PLANT	DATE 12/24/14	BY MM	CHECKED MM	APPROVED MM	SCALE AS SHOWN	REVISIONS 1. 12/24/14	STELLA-CHIEF WOOD PRESERVING KEDRON, WA, PLANT
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ATTACHMENT 3
CONCRETE FOUNDATION DESIGN DRAWINGS



Woodward-Clyde Consultants				DESIGNED: <u>LWG</u> DRAWN: <u>LWG</u> CHECKED: <u>SLC</u>		REVIEWED: _____ APPROVED: _____ DATE: _____		J.H. BAXTER DRIP PAD ARLINGTON PLANT		PLAN		Half Size SCALE: <u>1" = 20'</u> DATE: <u>3.4.1991</u> PROJECT: <u>91C0102</u> - DES	
				SHEET NO. <u>1</u> OF <u>2</u>									

APPENDIX B
INSPECTION LOGS

Arlington Facility

YEAR: _____

Director's Name	Initials

Legend:
✓ - Indicates OK
X - Indicates Action Taken
Note: All actions taken must be documented
in Section II of this form

Frequency: Weekly Inspections

Look for leakage or damage that indicates or could cause malfunction of equipment, sources of contamination, and general housekeeping.

[illegible]

Date	Description	Initials

(Continue on back of page if needed)

Plant Manager signature indicating review of this form for completion:

Revision Date: January 7, 2013

Daily Drip Pad Inspection Log – Drip Pad & Apron Area

Inspector:		Date:		
<i>The Treating Engineer is to complete this inspection every day, without exception. The entire Drip Pad, Apron and surrounding area are to be inspected for leaks, cracks, visible preservative drips and/ or contamination. Contamination is to be cleaned up immediately. Place collected and cleaning material in Main Treatment Area Satellite Accumulation drum.</i>				
Inspection: Give a brief description of any observed contamination, or check box if no contamination is observed.				
Area	Area Is Clean/Okay	Inspection Observations (leaks, cracks, visible drips, ground stain, etc.)	Initials	
Drip Pad #2	<input type="checkbox"/>			
Drip Pad #3	<input type="checkbox"/>			
Apron #2	<input type="checkbox"/>			
Apron #3	<input type="checkbox"/>			
Other Areas	<input type="checkbox"/>			
<u>Other Notes or Observations</u>				
Cleanup: Describe any cleanup performed or check box if no cleanup performed.				
Area	No Cleanup Performed	Cleanup Performed	Initials	
Drip Pad #2	<input type="checkbox"/>			
Drip Pad #3	<input type="checkbox"/>			
Apron #2	<input type="checkbox"/>			
Apron #3	<input type="checkbox"/>			
Other Areas	<input type="checkbox"/>			
<u>Other Notes or Observations</u>				
Disposal: Describe any disposal of cleanup materials and contaminated soil and rock or check box if no disposal.				
Area	No Disposal	Amount of Cleanup Materials Disposed, pounds	Amount of Soil and Rock Removed, pounds	Initials
Drip Pad #2	<input type="checkbox"/>			
Drip Pad #3	<input type="checkbox"/>			
Apron #2	<input type="checkbox"/>			
Apron #3	<input type="checkbox"/>			
Other Areas	<input type="checkbox"/>			
<u>Other Notes or Observations</u>				

ington Facility

[illegible]

Plant Manager signature indicating review of this form for completion

Revision Date: January 7, 2013

Wigton Facility

Frequency: Every charge must be listed on this form in order, including retreats

[illegible]

Plant Manager signature indicating review of this form for completion

Revision Date: January 7, 2013

Stellones

Arlington facility

Inspector's Name:	Initials:

Treated Storage Yard Inspection Record

Month/Year: ____/____

I. Inspections

Legend:
✓ - Indicates OK
X - Indicates Action Taken
Note: All actions taken must be documented in Section II of this form

Frequency: Daily when facility is operating, every Third day (72 hours) when not operating

Plant Location	Day	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
Cutback Skids																																
Butt Treated Storage																																
Inspection Skids																																
Treated Pole Storage																																
Load Out																																
Time of Inspection																																
Inspector's Initials																																

II. Observations, Problems, and/or Actions Taken (Continue on Back if needed)

Date	Description	Initials

Date	Description	Initials

Plant Manager signature indicating review of this form for completion
